IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Alexandria Division

VIRGINIA ANIMAL OWNERS)	
ALLIANCE, et al.,)	
Plaintiffs,)	
)	
V.)	Civil Action No.:
)	1:23-cv-00628-MSN-LRV
)	
K. MICHELLE WELCH, in her)	
individual and official capacity as)	
Senior Assistant Attorney General for)	
The State of Virginia, et al.,)	
)	
Defendants.)	

NOTICE OF CONSTITUTIONAL CHALLENGE TO A STATUTE

Plaintiffs, by and through undersigned counsel, pursuant to Fed. R. Civ. P. 5.1, hereby file this Notice of their Constitutional Challenge to the Virginia State Statues discussed in their Complaint (ECF 1) and their recently filed Response Motion filed (ECF 33). Plaintiffs realize that R. 5.1 requires this notice when a "statute is questioned and the parties do not include the state, one of its agencies, or one of its officers or employees in an official capacity," and that Plaintiffs sued state officials in their official capacity, out of an abundance of caution file this notice. <u>See</u> USCS Fed. R. Civ. P. 5.1.

Respectfully submitted this 10thth Day of October, 2023.

/s/ Mario B. Williams
Mario B. Williams
Va. Bar No. 91955

HUMANITY DIGNITY AND RIGHTS LLC

5600 Roswell Road Building C, Suite 103 Sandy Springs, Georgia 30342 (404) 341-4434 mwilliams@hdrattorneys.com admin@hdrattorneys.com Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of October 2023, I have served a true and correct copy of the foregoing NOTICE OF CONSTITUTIONAL CHALLENGE TO A STATUTE with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to all counsel of record and have served it or on the state attorney general by certified or registered mail.

/s/ Mario B. Williams Mario B. Williams Va. Bar No. 91955

HUMANITY DIGNITY AND RIGHTS LLC

5600 Roswell Road Building C, Suite 103 Sandy Springs, Georgia 30342 (404) 341-4434 mwilliams@hdrattorneys.com admin@hdrattorneys.com Counsel for Plaintiff